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ROUTING AND RECORD SHEET

SUBJECT: (Optional)

Title 44, United States Code

FROM:

EXTENSION

NO.

Chief, Printing & Photography Div. 1 Nov 1977

25X1

TO: (Officer designation, room number, and building)

DATE

OFFICER'S INITIALS

COMMENTS (Number each comment to show from whom to whom. Draw a line across column after each comment.)

RECEIVED FORWARDED

1. Director of Logistics

2. DD/L 16 NOV 1977

3. ED/OL 4 NOV 1977

4. AEO/OL 4 NOV 1977

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FORM NO. 1 MAY 56

238

REPLACES FORM 35-1 WHICH IS OBSOLETE

DOCUMENT CONTROL

(13-40) MFG 1-76

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FORM 3-62

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1 NOV 1977

MEMORANDUM FOR: Director of Logistics

FROM: Robert C. Conant
Chief, Printing & Photography Division

SUBJECT: Title 44, United States Code

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1. As you know, the subject of CIA exemption from Title 44, U.S.C. has been kicking about since the question of participation of the Agency in the Federal Depository Library Program (FDLP) arose. The DCI settled that issue in favor of participation. Subsequently, the legal body questioned procurement of printing equipment without an unprecedented request for approval from the Joint Committee on Printing (JCP). Thus, if we cannot rely upon the CIA Act of 1947, or several decades of well established precedent, i.e. practices performed outside of the provisions of Title 44 with the full knowledge and tacit approval of both the JCP and the Government Printing Office (GPO), or the fact that CIA has never been and is not now listed in "Title V: Authorized Federal Plants" in the Government Printing and Binding Regulations published by the JCP (attached regulations promulgated by JCP under the authority of sections 103, 501, and 502 of Title 44), or agreements reached in 1956 between the Agency and the JCP, we must then deal either head on or piecemeal with the question of compliance with Title 44.

2. In my opinion, there are three options open to us; viz, full compliance, request for waivers of sections of the Government Printing and Binding Regulations which are especially troublesome, or request for waivers of all sections except for participation in the FDLP.

3. Except for an administrative burden, Printing and Photography Division (P&PD) could actually comply totally with little other impact on its operations. The major impact will lie with the publishers, the readership, e.g. the President et al, and the Office of Technical Services (OTS), whose operations would somehow have to be protected in a security sense. In all, full compliance transfers a significant portion of the current management of Agency printing to the JCP, including portions of fiscal control. Potential impact is explored in the attached impact paper, a worse case approach. A third attachment is an initial draft letter to the JCP which requests waivers for all provisions of Title 44 except participation in the FDLP.

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SUBJECT: Title 44, United States Code

4. If full compliance with Title 44 is compelling, and a minimum deviance from the Government Printing and Binding Regulations is required, we would recommend that the Agency request waivers only for paragraphs 18 and 34 as identified in the attached impact paper. The basis for the request can be expanded, but in essence we would ask for waivers of these provisions which would afford publishers in the Agency the continued high quality products for VIP distribution as now exists. Even in these paragraphs we would apply the waivers only in those cases involving requirements for color, halftones, and typographic excellence. Most of these cases involve finished intelligence, although the question of administrative publications which heretofore have been done with similar high standards will have to be addressed, e.g. personnel recruitment material, public relations handouts, DDA Exchange, et al. This minimum deviance route does not take into account the peculiar problems associated with OTS.

5. With reference to paragraph 17, we simply suggest that copyright be respected regardless of the Office of General Counsel (OGC) opinion since in the final analysis the "printer" and not the legal counsel is legally responsible and would be prosecuted for violation.

6. We would not request a waiver on paragraph 20 if this type of printing can be accommodated by commercial printers.

7. We would not request a waiver of paragraph 25 (adhering to GPO Style Manual); however, publishers would have to accept these standards.

8. Paragraph 46 is a matter of little concern to P&PD and in those rare cases in which approval is needed it is anticipated that it could be obtained by a simple telecon with the JCP staff. However, a request for a waiver would be required for the continuance of the Office of Logistics/Procurement Division practice of direct procurement of forms.

9. If we have alternatives, guidance is requested. As an initial step, we recommend that OTS be brought into the arena by requesting an impact statement from them.

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Attachment 2

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1 NOV 1977

MEMORANDUM FOR: Director of Logistics

FROM: [REDACTED]

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Chief, Printing & Photography Division, OL

SUBJECT: Impact of Compliance With Selected Printing and
Binding Regulations of the Joint Committee on
Printing (Title 44)

1. [REDACTED] Action Requested: It is requested that a selected exemption from Title 44, United States Code be sought from the Joint Committee on Printing (JCP), Congress of the United States, for Central Intelligence Agency printing facilities.

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2. Background:

a. [REDACTED] Until recently the Printing & Photography Division (P&PD) had been under the impression that it, as well as all other Agency printing facilities, was exempt from Title 44, U.S.C. However, recent developments indicate that there is some disagreement as to whether an exemption does indeed exist. Further, neither the Agency nor the JCP has been able to surface sufficient documentation to satisfactorily resolve the matter. It is imperative that it be understood that compliance with, or an exemption from, Title 44 significantly affects not only the operations of P&PD but other printing facilities as well; viz, the printing operations of the Office of Technical Services/ Graphics Authentication Division (OTS/GAD); the National Photographic Interpretation Center (NPIC); the [REDACTED] Printing & Reproduction Branch [REDACTED] P&RB); the Joint Publication Research Staff (JPRS); and, to a much lesser extent the facilities located in the Cartography Division, Office of Geographic & Cartographic Research (OGCR) and in the Cable Secretariat.

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b. [REDACTED] Should all of the above Agency printing facilities fall under the jurisdiction of the JCP there would be serious ramifications. For your consideration in resolving the matter I have extracted all paragraphs which have impact on CIA printing operations from the Government Printing and Binding Regulations published by the JCP, dated April 1977. These regulations, paraphrased

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SUBJECT: Impact of Compliance With Selected Printing and Binding Regulations of the Joint Committee on Printing (Title 44)

in the interest of brevity, have been selected as those which would, in my opinion, cause the most concern for the various Agency printing facilities. The listing is in the sequential order of JCP regulations as published, followed by an explanation of current practices in the Agency facilities as best as can be determined. Finally, the potential impact that compliance with the regulations would have on all Agency printing operations is presented, with a natural inclination to cite the impact on the more familiar operations of P&PD. The effect on other operations is mentioned in less detailed form.

(1) [] Paragraph 9: - Outlines procedures for the purchase, rental, or transfer of certain types of equipment. The regulation specifies that the request for JCP approval to purchase, rent, or transfer equipment must contain a statement as to the need for the proposed equipment and must identify the name and location of the installation where the equipment will reside.

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(a) [] Current Practice (Ref. Par. 9): Periodic projections are made by P&PD for the purpose of identifying equipment which will improve the efficiency of its operation. Consideration is given to the need for replacement of existing equipment which is either obsolete or in a state of disrepair as well as to newly introduced equipment utilizing new processes or technological advancements which offer the potential for efficiency gain. Extensive studies are conducted to determine the most suitable equipment for current and future operation. The resultant conclusions establish the basis for selections which are then prioritized. Requests for equipment acquisitions are directed to, and fully coordinated with, appropriate authorizing officers within the Agency who are cognizant of the mission of the respective components.

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(b) [] Impact (Purchases) (Ref. Par. 9): The impact of compliance with this paragraph, confined here to purchases only, depends upon the understanding of the JCP in regard to the uniqueness of the Agency's printing operations. For example, most Government printing facilities are entirely satisfied with a large expenditure of time in press makeready in order to gain an increase in the number of copies produced per hour once the press is in its production run. P&PD operations, as well as those of other Agency facilities, contradict this practice; the printing of classified material necessarily means short production runs which, in turn, mandates quick makeready times to permit proper turnaround responses for intelligence publications containing current and very perishable material. In addition, the requirement to report the name and location of the installation where purchased equipment is to be placed would create [] problems for the OTS [] facilities.

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(c) [] Impact (Rentals) (Ref. Par. 9): On occasion, due to budgetary considerations, P&PD will lease equipment with an option to purchase at a later date. Compliance with the JCP requirement to acquire annual approvals for equipment rentals will transfer, to some degree, the control of equipment budgets from the Agency to the arena of the JCP, since the Committee will have the final authorizing power. The security aspect of identifying locations of installations, as mentioned above, will be applicable also to rentals of equipment.

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(d) [] Impact (Transfers) (Ref. Par. 9): Clarification is required to determine the intent of this paragraph. If interpreted to mean that prior approval of the JCP is required to transfer equipment between Agency printing facilities then this often used option for efficient management and control of equipment would be removed from the control of Agency management and instead would fall under the realm of JCP jurisdiction. However, if the regulation pertains to only interdepartmental exchanges, the impact is nil, since transfers of equipment usually occur only between Agency components.

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(2) [] Paragraph 10: Consists of procedures for disposal of excess printing equipment. It specifies that disposals may be conducted in accordance with existing procedures without prior reference to the JCP, except that disposals must be reported to the JCP within 30 days. 25X1

(a) [] Current Practice (Ref. Par. 10): Printing facilities dispose of equipment in accordance with established Agency regulations. 25X1

(b) [] Impact (Ref. Par. 10): The reporting requirement represents a potential security problem for OTS/GAD and [] P&RB which, in some cases, must dispose of equipment [] 25X1
[] 25X1
[] 25X1

(3) [] Paragraphs 11 and 12: Requires that any equipment utilizing new processes as a substitute for traditional methods be subjected to approval of the JCP prior to acquisition. Also requires the submission to the JCP of all available data pertaining to Agency plans to engage in research and development which may affect the graphic arts field. 25X1

(a) [] Current Practice (Ref. Par. 11 and 12): Agency printing facilities maintain a research and development capability in an environment that is completely free of concern for its possible impact on traditional printing methods; e.g., the research and development which led to the early successes of P&PD in computerized typesetting. There is a constant need to develop modifications to equipment which will yield improved efficiency in the Agency's unique operations or to accomplish specific tasks. Further, research is constantly being conducted to obtain improvements in products used for the production of sensitive documents, [] 25X1
[] 25X1

(b) [] Impact (Ref. Par. 11 and 12): Research and development, especially that which is conducted in protected environments, would be exposed to authorization 25X1

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SUBJECT: Impact of Compliance With Selected Printing and Binding Regulations of the Joint Committee on Printing (Title 44)

for approvals from a Committee that perhaps may have interests in maintaining the more traditional methods. The security factor would also be a matter of concern.

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(4) [] Paragraphs 14 and 15: Forbids the printing of signatures of technical illustrators, designers, typographers, or layout artists. This regulation also prohibits the use of courtesy credit lines by government employees.

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(a) [] Current Practice (Ref. Par. 14 and 15): P&PD had abided by this regulation for a number of years. However, at the time the publication Women of the CIA was being prepared for printing, P&PD was instructed to recognize the effort of Agency employees by printing the names of responsible parties who were involved in the layout and design of the publication. Should the subject surface again in the future, P&PD would seek approval from the Director of Logistics (D/L) before providing such recognition.

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(b) [] Impact (Ref. Par. 14 and 15): Forbids recognition of types of employees cited in regulations, regardless of authorizations granted by Agency officials.

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(5) [] Paragraph 17: Notes the essentiality of recognizing the rightful owners of material by printing the copyright notice in a subordinated type size.

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(a) [] Current Practice (Ref. Par. 17): P&PD presently monitors all material submitted for printing in an attempt to preclude the reproduction of copyrighted material. When suspect material is discovered the requisitioner is notified of the existence of a potential infringement and is informed that approval of the Office of the General Counsel (OGC) must be acquired before the material can be printed. In spite of these procedures it is felt that some material protected by copyright is reproduced in classified documents under the auspices of fulfilling the Agency's mission. Even the authority of the OGC to render opinions in these cases must be questioned-- is an infringement more permissible simply because it bears an OGC approval? The printer is ultimately responsible under the law. Perhaps OTS/GAD, charged with a very different responsibility than P&PD, would be even more concerned with this regulation.

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(b) [] Impact (Ref. Par. 17): This regulation has relatively little impact on the P&PD operation; probably more impact would be felt by OTS/GAD and [] P&RB.

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(6) [] Paragraph 18: Addresses the concern of the JCP regarding the use of color in printing; specifically, that printing in two or more colors generally increases costs. The regulation specifies that all multicolor printing shall contribute demonstrable value toward achieving a greater fulfillment of the ultimate end purpose of the printed piece. The JCP suggests the use of three colors instead of four, etc., as well as improvements in layout and design as a means to avoid the use of color.

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(a) [] Current Practice (Ref. Par. 18): P&PD attempts to restrain customer desires in the use of color printing for purely frivolous purposes. However, in most cases originating offices must still be relied upon to be the judge of the value that color may provide to the end product. For example, P&PD recently produced new covers which are to be used for many of the Agency's publications, most of which are multicolored. These covers certainly could have been designed with only one color but it is P&PD's impression that the Agency wishes to upgrade the quality of its publications and has as its goal the production of publications that offers an image of being professionally done. To this end, Agency publications have been re-designed to incorporate multicolored printing as a basis for accomplishing the desired effects.

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(b) [] Impact (Ref. Par. 18): Compliance would require a reassessment of the Agency's objectives in terms of precisely what constitutes a professional appearing publication and whether this appearance can be accomplished via the restriction on multicolors.

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(7) [] Paragraph 20: Forbids the printing of business cards at government expense.

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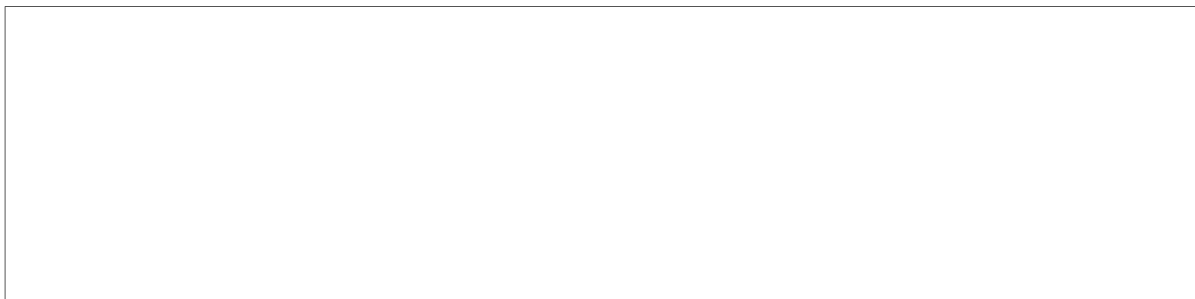
(a) [] Current Practice (Ref. Par. 20): P&PD prints business cards, letterheads, and envelopes

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(8) (U) Paragraph 24: Pertains to correspondence and liaison with the JCP. Specifies that all contact with the JCP be handled by only one designated official in the Agency.

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(a)  Current Practice (Ref. Par. 24): P&PD has only recently become involved in matters with the JCP. On the few occasions when contact was necessary P&PD conducted its liaison with the JCP through the Office of the Legislative Counsel (OLC).

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(b)  Impact (Ref. Par. 24): Clarification is needed as to identification of the designated source. If OLC is to assume this responsibility on a continuing basis it should be made clear that all forms, requisitions, and correspondence necessary for the conduct of Agency business would indeed rest in the OLC area.

(9) Paragraph 25: Cites the responsibility of the DCI to cause all printing and binding to be standardized. This paragraph cites the opinion of the JCP that the Government Printing Office (GPO) Style Manual be adhered to and that deviations from the GPO Style Manual generally constitute waste in printing and binding.

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(a)  Current Practice (Ref. Par 25): Each publishing office in the Agency has adopted a unique style for punctuation, abbreviations, captions, tabular headings, etc. Obviously, the variations are rooted in the belief that each preferred style aids in clarifying the material. With the advent of electronic scanners and video display terminals in publishing offices, P&PD has, in effect, relinquished control in this area to the publishing office. Further, the

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Publications and Presentations Group (P&PG) has compiled a handbook of style for use by its editors, analysts, and production personnel as a reference aid for consistent style. In some instances, this manual contradicts the style as established in the GPO Style Manual.

25X1 (b) [] Impact (Ref. Par. 25): Compliance would force a mandatory set of rules and procedures on publishing offices, to be adhered to regardless of personal preferences of Agency personnel (many at very high levels) for the presentation of material.

25X1 (10) [] Paragraph 27: Limits the number of copies which can be distributed free by the Agency.

25X1 (a) [] Current Practice (Ref. Par. 27): Very seldom a source of concern for P&PD. May be a problem for printing plants (OTS/GAD) involved in propaganda brochures, pamphlets, etc.

25X1 (b) [] Impact (Ref. Par. 27): Compliance with this paragraph would require further investigation to determine its impact on Agency operations. Specifically, precise quantities of copies distributed free of charge to other than governmental sources demands further study. P&PD would only be concerned when requests are received for printing of publications known to be primarily as documents to be distributed by the Agency free to the public; for example, the publication Intelligence in the War of Independence, various publications offered by the DCI, Public Affairs, Office of Personnel.

25X1 (11) [] Paragraph 34: Refers to the establishment of specification standards of paper to be used in Government printing, including paper to be used on copying and duplicating devices. Unless otherwise authorized by the JCP these specifications and standards are mandatory for use in the Agency. It is the opinion of the JCP that paper other than that listed in the standards constitutes waste in public printing and the JCP directs that the practice be discontinued. This paragraph also offers the opinion of the JCP that semiannual

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SUBJECT: Impact of Compliance With Selected Printing and Binding Regulations of the Joint Committee on Printing (Title 44)

and annual contracts for paper are not in the best interests of the Government and such contracts should be used only when savings in costs are clearly demonstrable.

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(a) [] Current Practice (Ref. Par. 34):

P&PD is of the opinion that its operation is truly unique. On an individual job basis, P&PD personnel determine the most suitable paper to be used on each job in order to obtain the highest quality reproduction of text, photographs, maps, and charts at the least possible cost. To this end, P&PD effects annual contracts with vendors for paper stock not available through GPO. Stock available through GPO is, of course, requisitioned. The logic for the establishment of P&PD paper contracts with the commercial vendor is rather basic; the contention of P&PD being that projects []

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[] having already expended vast sums to acquire quality images should not suffer a lesser quality image via reproductions printed on substandard stock. []

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(b) [] Impact (Ref. Par. 34): Obviously, compliance with this paragraph would have a significant adverse effect on the operations of both P&PD and OTS/GAD, and with some detrimental effect on NPIC and the [] facilities. It is the opinion of P&PD that the very nature of the Agency's printing operations mandates the use of stock deemed most suitable for the accomplishment of its objectives. []

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(12) Paragraph 46: Requires authorization from the Public Printer for the Agency to make direct purchases of printing, binding, or related material.

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SUBJECT: Impact of Compliance With Selected Printing and Binding Regulations of the Joint Committee on Printing (Title 44)

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(a) Current Practice (Ref. Par. 46):
The most common Agency practice of purchasing printing directly from vendors occurs in those instances when Agency forms are purchased from suppliers by the Office of Logistics/Procurement Division (OL/PD). Through FY 1976 P&PD had obtained annual waivers from the Public Printer which allowed OL/PD to acquire specialty forms directly from vendors inasmuch as neither P&PD nor the Government Printing Office (GPO) possesses the specialized equipment required for their production. However, prior to FY 1977 P&PD was notified of a forthcoming restriction, levied by the General Accounting Office, on this type of activity. Consequently, future waivers were to be more difficult to obtain. This information was relayed to OL/PD with instructions to submit a firm justification to P&PD for transmittal to GPO for an attempt to acquire the waivers. This justification has not yet been received, and essentially all forms procured directly from vendors in FY 1977 and to date in FY 1978 have been acquired without required GPO waiver. Also, in rare cases P&PD must rely on commercial vendors to provide unique services on unclassified publications that neither P&PD nor GPO is equipped to perform. For instance, occasionally P&PD has unclassified publications wire bound at a commercial bindery. Decisions in this regard are made by P&PD management.

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(b) Impact (Ref. Par. 46): Curtailment of the OL/PD practice of making direct procurements from vendors would necessarily force the Office of Logistics/Supply Division and others as well, into a more efficient system of stock control in order to absorb the lengthened lead times that would be required for the processing of requisitions through GPO. In the case of the P&PD practice of procuring unique services, the decisionmaking power would be transferred from P&PD to the Public Printer.

(13) (U) Paragraphs 448 thru 55: Describes the various reports that must be furnished to the JCP and outlines the frequency of reporting. Basically, the paragraphs deal with reports on production, production costs, commercial printing, acquisition of collators for nonprinting offices, map and chart production, plant inventory, stored equipment and excess equipment.

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SUBJECT: Impact of Compliance With Selected Printing and Binding Regulations of the Joint Committee on Printing (Title 44)

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(a) [] Current Practice (Ref. Paras. 48 thru 55): P&PD maintains a system of reports that management feels are vital and necessary for current operations and for forecasting future requirements. Other reports are maintained in compliance with established Agency regulations.

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(b) [] Impact (Ref. Paras. 48 thru 55): The practice of redundant reporting is contrary to the current attempt of Government officials to reduce the inherent inefficiencies entailed in duplications, and the value of this additional reporting is, to say the least, questionable. There are also serious security ramifications.

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3. [] Recommendation: It is the recommendation of P&PD that the Agency request from the JCP an exemption from Title 44 for Agency printing facilities.

(a) This recommendation is based on the contention that the intent of Title 44 is to render to the JCP sufficient authority in the areas of printing and binding equipment, supplies, and methods to allow effective control for the hundreds of Government printing facilities dispersed throughout the United States. It must be borne in mind that the responsibility of these facilities is to produce graphic communications deemed to be of interest to the general public. It follows then that the JCP is obligated to demand that material of interest to the public is also produced in the public interest; i.e., in the most efficient and economical manner possible. This JCP obligation encompasses the oversight of the whole realm of inputs utilized to acquire the end product; viz, equipment, ink, paper, and methods.

(b) The mission of the Agency's printing facilities is to produce high quality classified publications and other documents of a very sensitive nature. By necessity, the dissemination of these documents is restricted to appropriate Government officials. Cost effectiveness is inherent in the task of producing intelligence data containing very current material within the constraints

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of short deadlines. Concomitant with this stated mission is the fact that in many instances the sterility of supplies and equipment must be maintained and the identification of personnel and location of installations must be protected.

(c) In view of these wide ranging differences in missions it is our opinion that the jurisdiction of the JCP should not be extended to the operations of the Agency's printing facilities.

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Attachment 3

CENTRAL INTELLIGENCE AGENCY

WASHINGTON, D.C. 20505

spell out
The Hon. Howard W. Cannon, Chairman
Joint Committee on Printing
c/o U.S. Senate P.O.
Washington, D.C. 20510

Dear Senator Cannon;

The Central Intelligence Agency (CIA) has been under the impression that its printing facilities have, since their inception, been exempt from Title 44, United States Code and these were outside of the jurisdictional realm of the Joint Committee on Printing (JCP). However, we have recently learned that this impression could not be reinforced with proper documentation. Consequently, some indecision is currently being experienced because of our uncertain status in regard to the Agency's printing facilities with respect to the JCP.

As background, we have felt through the years that the intent of Title 44 was to establish the JCP as the jurisdictional body which was charged with the oversight of public printing, binding, and distribution of Government publications. In essence, we interpreted this oversight responsibility as being directed to the control of the hundreds of Government printing facilities dispersed throughout the United States which produce material deemed to be of interest to the general public and which therefore should be printed in the interest of the public; i.e., in the most efficient manner possible.

Printing facilities operated by the CIA have a quite different mission. That mission is devoid of an obligation to print and disseminate material of public interest, except as the Agency makes available certain unclassified documents through the Federal Depository Library Program (FDLP) that were primarily intended for United States Government use. Instead, our facilities are operated solely to provide appropriate Government officials with classified publications and other documents of a very sensitive nature. In some cases every aspect of the operation (personnel, budget, and material) is managed under very strict security precautions.

It is our opinion that the diverse operations of the CIA printing facilities preclude an analogy with those resident in other Government departments and that jurisdiction of the JCP should not be extended to include the unique operations of the CIA printing facilities. A waiver from Title 44 would exempt CIA from this jurisdiction and it is hereby requested. It is the intention of the CIA to continue with contributions to the FDLF.

Your consideration in this matter is greatly appreciated.

Sincerely,

CENTRAL INTELLIGENCE AGENCY

WASHINGTON, D. C. 20505

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PENALTY FOR PRIVATE USE \$300



PENALTY FOR PRIVATE USE TO AVOID
PAYMENT OF POSTAGE, \$300

The Hon. Howard W. Cannon, Chairman
Joint Committee on Printing
c/o U.S. Senate P.O.
Washington, D. C. 20510

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